

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PB LIFE AND ANNUITY CO., LTD., *et al.*,

Debtors in Foreign Proceedings

Chapter 15

Case No. 20-12791 (LVB)
(Jointly Administered)

UNIVERSAL LIFE INSURANCE
COMPANY,
Plaintiff,

Adv. Proc. No. 21-01169 (LGB)

v.

GLOBAL GROWTH HOLDINGS, INC., *et al.*
Defendants.

**DECLARATION OF CLINTON E. CAMERON IN SUPPORT OF OMNIBUS MOTION
TO DISMISS OF PLAINTIFF UNIVERSAL LIFE INSURANCE COMPANY**

Pursuant to 28 U.S.C. § 1746, Clinton E. Cameron, makes this declaration in support of the Omnibus Motion to Dismiss of Universal Life Insurance Company (“ULICO”) in the above-captioned adversary proceeding.

1. I am a partner in the law firm of Clyde & Co US LLP, counsel to the Plaintiff, ULICO, in the above-captioned adversary proceeding.

2. I have personal knowledge of the matters set forth in this declaration except where otherwise specified.

3. Attached as Exhibit A to this declaration is a true and correct copy of the November 4, 2021 settlement agreement between ULICO and the Joint Provisional Liquidators acting on behalf of the Debtor, PB Life & Annuity Co., Ltd. (“PBLA”).

4. Attached as Exhibit B is a true and correct copy of the online version of an article entitled, “Financier Who Amassed Insurance Firms Diverted \$2 Billion Into His Private Empire,” that appeared in the February 28, 2019 edition of the *Wall Street Journal*.

5. Attached as Exhibit C is a true and correct copy of the online version of an article entitled, “Insurance Magnate Greg Lindberg Found Guilty on Bribery Charges,” that appeared in the March 5, 2020 edition of the *Wall Street Journal*.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 6, 2021

s/ Clinton E. Cameron
Clinton E. Cameron